

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GREATER BOSTON LEGAL SERVICES, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

Case No.: 1:21-cv-10083-DJC

**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN FURTHER SUPPORT OF
PLAINTIFFS' PARTIALLY ASSENTED-TO MOTION FOR AN EXTENSION OF
TIME TO COMPLETE FACT DISCOVERY**

Pursuant to Local Rule 7.1(b)(3), Plaintiffs respectfully request leave of Court to file a Reply in response to Defendants' opposition to Plaintiffs' motion for an extension of time to complete fact discovery. The proposed Reply is attached hereto as **Exhibit A**. In support of this motion, Plaintiffs state as follows:

1. On May 2, 2024, Plaintiffs filed a Partially Assented-To Motion for an Extension of Time to Complete Fact Discovery (ECF No. 118) (the "Motion").
2. On May 10, 2024, Defendants filed an Opposition to Plaintiff's Motion for an Extension of Time to Complete Fact Discovery (ECF No. 119) (the "Opposition").
3. Plaintiffs respectfully submit that their proposed Reply is necessary to provide further context and respond to Defendants' arguments set forth in their Opposition, and therefore respectfully request that they be permitted to file the Reply attached at Exhibit A.
4. The undersigned counsel for Plaintiffs conferred with counsel for Defendants, who indicated that Defendants assent to this motion. *See infra* Local Rule 7.1(a)(2) Certification.

Dated: May 16, 2024

By: /s/ Adriana Lafaille

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LOCAL RULE 7.1(a)(2) CERTIFICATION

I communicated over email with counsel for Defendants regarding this motion. Counsel indicated that Defendants assent to this motion.

Dated: May 16, 2024

/s/ John T. Montgomery
John T. Montgomery